

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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|---|---|-----------------------------|
| In re: | § | Chapter 11 |
| | § | |
| TMT PROCUREMENT CORP., et al.,¹ | § | Case No. 13-33763 |
| | § | |
| DEBTORS. | § | Jointly Administered |

**DEBTORS' WITNESS AND EXHIBIT LIST
FOR AUGUST 21, 2013, 8:00 A.M. HEARING**

The above-captioned Debtors and Debtors in Possession, hereby file their attached Witness and Exhibit List for the August 21, 2013 hearing (Dkt. No. 13).

WITNESSES

- Dr. John D. Finnerty, Managing Director, AlixPartners
- Lisa Donahue, Managing Director, AlixPartners
- Hsin Chi Su (or Nobu Su), President, TMT Group

The Debtors reserve the right to call rebuttal witnesses as necessary. The Debtors reserve the right to call any witnesses identified or called by another party or by the Court. The Debtors reserve the right to not call any witness identified here. The Debtors reserve the right to supplement this Witness List.

¹ The Debtors in these chapter 11 cases are: (1) A Whale Corporation; (2) B Whale Corporation; (3) C Whale Corporation; (4) D Whale Corporation; (5) E Whale Corporation; (6) G Whale Corporation; (7) H Whale Corporation; (8) A Duckling Corporation; (9) F Elephant Inc.; (10) A Ladybug Corporation; (11) C Ladybug Corporation; (12) D Ladybug Corporation; (13) A Handy Corporation; (14) B Handy Corporation; (15) C Handy Corporation; (16) B Max Corporation; (17) New Flagship Investment Co., Ltd; (18) RoRo Line Corporation; (19) Ugly Duckling Holding Corporation; (20) Great Elephant Corporation; and (21) TMT Procurement Corporation.

EXHIBITS

| Ex. No. | Description | Offered | Objection | Admitted/ Not Admitted |
|---------|---|---------|-----------|------------------------------|
| 1. | Order granting in part and denying in part the Joint Emergency Motion for Entry of an Order Dismissing with Prejudice the Debtors' Chapter 11 Case Pursuant to Sections 105(a), 305(a), 349, and/or 1112(b) of the Bankruptcy Code [Dkt. No. 134] | | | |
| 2. | Proposed Share Escrow Agreement, dated as of August 21, 2013 [Dkt. No. 250-1] | | | |
| 3. | Expert Report (with attachments) of Dr. John D. Finnerty | | | |
| 4. | Docket Report for Case No. 4:12-cv-03131, <i>Vantage Drilling Co. v. Hsin Chi Su</i> , United States District Court for the Southern District of Texas | | | |
| 5. | Plaintiff's Original Petition in Case No. 4:12-cv-03131, <i>Vantage Drilling Co. v. Hsin Chi Su</i> , United States District Court for the Southern District of Texas | | | |
| 6. | Order on Stock Encumbrance [Dkt. No. 79, in Case No. 4:12-cv-03131, <i>Vantage Drilling Co. v. Hsin Chi Su</i> , United States District Court for the Southern District of Texas] | | | |
| 7. | 2 Week Budget through Week Ending August 30 | | | |
| 8. | Proposed Cash Collateral Order | | | |
| 9. | CM/ECF Transaction Log showing <i>In re B Handy Corp.</i> , Case No. 13-33756 opened at 10:40:09 Houston Time (17:40:09 Gibraltar Time) on June 20, 2013 | | | |
| 10. | Warrant of Arrest for <i>M.V. B Handy</i> issued pursuant to claim of Shanghai Commercial & Savings Bank, Ltd. | | | |
| 11. | Log Book of <i>M.V. B Handy</i> , signed | | | |

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|-----|--|--|--|--|
| | by Master and Chief Officer, showing vessel arrest occurred at 20:50 Gibraltar Time (13:50 Houston Time) | | | |
| 12. | Letter dated June 20, 2013, to Shanghai Commercial & Savings Bank Ltd. and Gibraltar counsel requesting turnover of <i>M.V. B Handy</i> | | | |
| 13. | Letter dated July 31, 2013, to U.S. bankruptcy counsel for Shanghai Commercial & Savings Bank Ltd. requesting release of the <i>M.V. B Handy</i> | | | |
| 14. | Email to P McLauchlan et al. dated August 1, 2013, attaching 13 week budget for B Handy | | | |
| 15. | Current charter for <i>M.V. B Handy</i> dated May 30, 2013 | | | |
| 16. | Email dated August 5, 2013, from Rafael Valverde to Vincent Yen, attaching estimated arrest costs from Admiralty Marshal of Gibraltar as of August 5, 2013 | | | |

The Debtors reserve the right to utilize rebuttal exhibits as necessary. The Debtors reserve the right to supplement this Exhibit List. The Debtors reserve the right to use as their own exhibit any exhibit identified or offered by any other party.

Respectfully submitted,

BRACEWELL & GIULIANI LLP

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**PROPOSED COUNSEL FOR THE DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

The undersigned certifies that on August 19, 2013, a true and correct copy of this document was served on all parties as listed on the court's ECF noticing system.

/s/ Jason G. Cohen

Jason G. Cohen